

AFFIDAVIT

I, Matthew J. Hamulak, being first duly sworn, depose and say:

1. I am a Special Agent with Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), United States Department of Homeland Security (DHS), duly appointed according to law and acting as such, with twenty years experience as an Immigration Agent. I possess a Bachelor of Science and a Master of Science degree in Criminal Justice. I am assigned to the Cleveland, Ohio office of ICE. I have investigated numerous matters involving fraudulent activities entered into by individuals to circumvent immigration laws, including marriage and naturalization fraud.

2. Nisrine El Khoury (EL KHOURY), George Ajaltouni (GEORGE AJALTOUNI) and Steve Ajaltouni (STEVE AJALTOUNI) are natives of Lebanon and naturalized United States citizens. GEORGE AJALTOUNI and STEVE AJALTOUNI are brothers. As described below, EL KHOURY's and GEORGE AJALTOUNI's naturalization was contrary to law pursuant to Title 18 USC 1425 (Procurement of Citizenship or Naturalization Unlawfully) due to EL KHOURY obtaining Lawful Permanent Resident (LPR) status, and ultimately United States citizenship, through a fraudulent marriage to STEVE AJALTOUNI. GEORGE AJALTOUNI made materially false claims on his naturalization and United States passport applications to assist in concealing the fraudulent marriage between EL KHOURY and STEVE AJALTOUNI. Most notably, GEORGE AJALTOUNI and EL KHOURY did not disclose on immigration and United States passport documents that they were married to each other at the time of EL KHOURY's marriage to STEVE AJALTOUNI. At the time of STEVE AJALTOUNI's and EL KHOURY's marriage, GEORGE AJALTOUNI was a LPR, EL KHOURY was a nonimmigrant visitor, and STEVE AJALTOUNI was a naturalized United States citizen.

3. EL KHOURY benefited from the fraudulent marriage to STEVE AJALTOUNI in that spouses of United States citizens are afforded an immediate visa in the United States under the Immediate Relative visa category. That is, foreign nationals who marry United States citizens receive a Resident Alien Card (commonly referred to as a green card) immediately because there are no numerical limits on the number of Immediate Relative visas granted each year. Secondly, foreign nationals who receive their immigrant visa based upon marriage to a United States citizen have to wait three (3) years before applying for United States citizenship, whereas foreign nationals who receive their immigrant visa based upon marriage to a LPR have to wait five (5) years before applying for United States citizenship. Foreign nationals who marry LPRs must apply for their visa under the Family Second Preference category. The number of visas issued each year under this category is limited. As there are more applicants than visas, foreign nationals who marry LPRs are put on a waiting list until their visa is available. For example, according to the Department of State Visa Bulletin, a foreign national who married a LPR in July 2004 had to wait until March of 2009 for their visa to become available.

4. Records obtained from Lebanese authorities indicate on July 20, 2004, EL KHOURY and GEORGE AJALTOUNI were married at the al-Batroun Maronite diocese, in Lebanon. On July 12, 2011, EL KHOURY's and GEORGE AJALTOUNI's signatures were executed on the marriage contract. EL KHOURY is listed as the wife, and GEORGE AJALTOUNI as the husband on this marriage contract. There is no indication on these documents that GEORGE AJALTOUNI AND EL KHOURY filed for, or received a divorce. It is not clear why the contract was not signed until 7/12/2011.

5. The Republic of Lebanon, Ministry of Interior Municipalities, Directorate General of Civil Status, indicates that EL KHOURY moved on July 31, 2004, from No. 493 al Batroun for

marriage. This same document indicates that GEORGE AJALTOUNI and EL KHOURY have (3) children; S.C.A, S.A.A, and M.A.

6. On September 18, 2004, EL KHOURY and GEORGE AJALTOUNI entered the United States at San Francisco, California on United Airlines flight number 931. EL KHOURY was admitted to the United States as a nonimmigrant visitor (B2 visa) and GEORGE AJALTOUNI as a returning LPR.

7. On October 15, 2004, STEVE AJALTOUNI became a Naturalized United States citizen in the United States District Court, Northern District of Ohio, Cleveland, Ohio (Certificate Number 28425507).

8. On November 8, 2004, STEVE AJALTOUNI and EL KHOURY married in the Rocky River, Ohio Municipal Court by Judge Donna C. Fitzsimmons (Case number 2004ML877037).

9. On December 13, 2004, STEVE AJALTOUNI completed a United States passport application. STEVE AJALTOUNI listed his spouse as EL KHOURY on the application. STEVE AJALTOUNI listed the date of his marriage to EL KHOURY as 11/10/2004. Official records indicate that EL KHOURY and STEVE AJALTOUNI married on 11/8/2004. STEVE AJALTOUNI listed his address as 2880 Wooster Road in Rocky River, Ohio, on the application. The United States passport for STEVE AJALTOUNI was issued on 6/12/2005.

10. On August 18, 2005, S.C.A. was born in Cleveland, Ohio. STEVE AJALTOUNI and EL KHOURY are listed as the parents on S.C.A.'s (female) Ohio birth certificate (State File Number 10240).

11. On March 28, 2006, EL KHOURY signed the I-485 Application to Adjust Status to a LPR. The I-485 Application to Adjust Status contains the following warning above the signature block (Part 4), *"I certify under penalty of perjury under the laws of the United States of America*

that this application and the evidence submitted with it is all true and correct.” EL KHOURY answered no to question 1a, Part 3, of the I-485 Application to Adjust Status which asks if the applicant has knowingly committed any crime of moral turpitude or drug related offense for which he/she was not arrested. EL KHOURY answered no to question 10, Part 3, of the I-485 Application to Adjust Status, which asks if the applicant has by fraud or misrepresentation of material facts procured or attempted to procure an immigration benefit. EL KHOURY also claimed to reside with STEVE AJALTOUNI at 2880 Wooster Road in Rocky River, Ohio on the I-485 Application to Adjust Status.

12. On March 29, 2006, STEVE AJALTOUNI signed the I-130 Petition for Alien Relative on EL KHOURY’s behalf. The purpose of the I-130 Petition for Alien Relative is to establish that a familial relationship exists between the petitioner (STEVE AJALTOUNI) and the beneficiary (EL KHOURY). The I-130 Petition for Alien Relative indicates that EL KHOURY and STEVE AJALTOUNI married in Rocky River, Ohio on 11/13/2004. Official records indicate that EL KHOURY and STEVE AJALTOUNI married on 11/8/2004. The I-130 Petition for Alien Relative confirms that EL KHOURY has not been married previously. The I-130 Petition for Alien Relative lists EL KHOURY and STEVE AJALTOUNI as living together at 2880 Wooster Road, Rocky River, Ohio. The I-130 Petition for Alien Relative contains the following warning above the signature block (Part E), *“INS investigates claimed relationships and verifies the validity of documents. INS seeks criminal prosecutions when family relationships are falsified to obtain visas. By law, you may be imprisoned for not more than (5) years or fined \$250,000, or both, for entering into a marriage contract for the purpose of evading any provision of the immigration laws. In addition, you may be fined up to \$10,000 and imprisoned for up to (5) years, or both, for knowingly and willfully falsifying or concealing a material fact or using any false document in*

submitting the petition. I certify, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.” The I-130 Petition for Alien Relative is only signed by the petitioner (STEVE AJALTOUNI) and not the beneficiary (EL KHOURY). USCIS approved the I-130 Petition for Alien Relative on 6/21/2006.

13. On June 7, 2006, STEVE AJALTOUNI and EL KHOURY completed a United States passport application for minor child S.C.A. (DOB xx/xx/2005). STEVE AJALTOUNI is listed as the father and EL KHOURY is listed as the mother on the application. STEVE AJALTOUNI and EL KHOURY signed the application indicating that they are S.C.A.’s parents. S.C.A.’s address is listed as 2880 Wooster Road in Rocky River, Ohio, on the application. EL KHOURY provided her Lebanese passport, and STEVE AJALTOUNI provided his Ohio driver’s licenses as proof of identity when completing the application. GEORGE AJALTOUNI is listed as the emergency contact on the application. The United States passport for S.C.A. was issued on 6/15/2006.

14. On June 20, 2006, EL KHOURY appeared in front of United States Citizenship and Immigration Services (USCIS) Officer Virginia Small in Cleveland, Ohio, for her I-485 Adjustment of Status Interview. EL KHOURY swore under penalty of perjury to USCIS Officer Small that the Information on the I-485 Application to Adjust status was true and correct. EL KHOURY confirmed to Officer Small that she never knowingly committed a crime of moral turpitude for which she was not arrested, never committed fraud or misrepresented material facts while procuring or attempting to procure immigration benefits, and that she currently lived with STEVE AJALTOUNI at 2880 Wooster Road in Rocky River, Ohio. USCIS Officer Small’s notes indicate that EL KHOURY stated during the interview that she and STEVE AJALTOUNI began dating when they were 17 yrs. old, and decided to get married when she came to visit. EL

KHOURY explained to Officer Small that she and STEVE AJALTOUNI had been dating for a long time and missed each other so they decided to get married.

15. On July 19, 2006, EL KHOURY's I-485 Application to Adjust Status was approved by USCIS granting her conditional resident status. Two years of conditional resident status is given to foreign nationals whose marriage to their United States citizen spouse is less than two years old at the time the I-485 Application to Adjust Status is adjudicated by USCIS. Within (90) days of the two (2) year conditional resident status expiration, the foreign national must file a petition (Form I-751) with USCIS to remove the conditional status of their residency in the United States. If USCIS approves the petition, the foreign national is granted LPR status.

16. Official federal and State of Ohio records indicate EL KHOURY and STEVE AJALTOUNI did not share a common address in 2006 despite being married. These same records indicate that EL KHOURY and GEORGE AJALTOUNI maintained a shared address in 2006.

- A. On October 11, 2006, STEVE AJALTOUNI was issued an Ohio driver's license (driver's license number RW599xxx) listing his home address as 2880 Wooster Road in Rocky River, Ohio.
- B. On November 7, 2006, EL KHOURY was issued an Ohio driver's license (driver's license number TG649xxx) listing her home address as 2882 Wooster Road, Rocky River, Ohio.
- C. On November 30, 2006, STEVE AJALTOUNI was cited for speeding by the Cleveland Police Department. STEVE AJALTOUNI confirmed that his address was 2880 Wooster Road in Rocky River, Ohio during this encounter.

D. GEORGE AJALTOUNI claimed on immigration records, including his N-400 Application for Naturalization, that he resided at 2882 Wooster Road in Rocky River, Ohio from 11/22/2003-4/15/2007.

17. On November 28, 2006, STEVE AJALTOUNI purchased a home located at 23252 Bridgeport Drive in North Olmsted, Ohio, for \$239,450.

18. On March 20, 2007, GEORGE AJALTOUNI purchased a home located at 3391 Bridgeport Drive in North Olmsted, Ohio, for \$230,000.

19. On October 7, 2007, EL KHOURY filed a Combined Programs Application (JFS 07216) requesting Health Coverage and Nutritional Program for Women, Infants, and Children from the State of Ohio. EL KHOURY listed her home address as 3391 Bridgeport Drive, North Olmsted, Ohio on the application. Additionally, EL KHOURY indicated that she lived with her daughter S.C.A. and brother-in-law GEORGE AJALTOUNI. STEVE AJALTOUNI is not listed on the application as residing at 3391 Bridgeport Drive North Olmsted, Ohio.

20. On October 14, 2007, GEORGE AJALTOUNI posted on his Facebook page a photo of himself and EL KHOURY dressed in formal clothing with their arms around each other. The photo included other family members including GEORGE AJALTOUNI's mother Zeina Tannous. On the same date, GEORGE AJALTOUNI posted a photo of himself and EL KHOURY sitting next to and leaning towards each other at a reception hall with STEVE AJALTOUNI sitting two seats from EL KHOURY. Based upon GEORGE AJALTOUNI's clothing, these photos were not taken during the same event. On the same date, GEORGE AJALTOUNI posted a shirtless photo of himself having his teeth brushed by S.C.A. I believe that this Facebook page in the name GEORGE AJALTOUNI belongs to the GEORGE AJALTOUNI discussed throughout this affidavit based upon biographic information and photos posted on the Facebook page.

21. On November 15, 2007, EL KHOURY was cited in Fairview Park, Ohio for Traffic Control Devices. EL KHOURY listed her home address as 3391 Bridgeport Drive in North Olmsted, Ohio. The court docket indicates that EL KHOURY was driving a black 1996 passenger car bearing Ohio license plate DIU2915. State of Ohio records confirm that this vehicle was registered to GEORGE AJALTOUNI.

22. On November 15, 2007, GEORGE AJALTOUNI was issued an Ohio's driver's license (driver's license number ST700xxx) listing his home address as 3391 Bridgeport Drive, North Olmsted, Ohio.

23. On January 6, 2008, EL KHOURY posted on her Facebook page a photo of herself and GEORGE AJALTOUNI standing with their arms around each other while GEORGE AJALTOUNI is holding S.C.A. in his other arm. STEVE AJALTOUNI is standing next to GEORGE AJALTOUNI in the photo. This photo was taken inside of a church and S.C.A. is wearing clothing typical for a baptism or other religious ceremony. On the same date, EL KHOURY posted a photo of her and GEORGE AJALTOUNI holding hands. EL KHOURY and GEORGE AJALTOUNI appear in the photograph with other family members including GEORGE AJALTOUNI's mother Zeina Tannous. I believe that this Facebook page in the name EL KHOURY belongs to the EL KHOURY discussed throughout this affidavit based upon biographic information and photos posted on the Facebook page.

24. On March 2, 2008, S.A.A. (male) was born in Cleveland, Ohio. STEVE AJALTOUNI and EL KHOURY are listed as the parents on S.A.A.'s Ohio birth certificate.

25. On March 4, 2008, STEVE AJALTOUNI posted "is loving his new baby nephew (little steve)" on his Facebook page. Due to the Facebook post being made two (2) days after S.A.A.'s birth, I believe that STEVE AJALTOUNI is referring to the birth of S.A.A. I believe that this

Facebook page in the name STEVE AJALTOUNI belongs to the STEVE AJALTOUNI discussed throughout this affidavit based upon biographic information and photos posted on the Facebook page.

26. On an unknown date after the births of S.C.A. and S.A.A., STEVE AJALTOUNI's name was removed as the father on S.C.A.'s and S.A.A.'s Ohio birth certificate. The current Ohio birth certificates for S.C.A. and S.A.A. do not list a father's name. A grand jury subpoena has been served, and results pending, as to when this change on the Ohio birth certificates was made.

27. On June 13, 2008, STEVE AJALTOUNI and EL KHOURY signed form I-751 Petition to Remove Conditions of Residence. STEVE AJALTOUNI and EL KHOURY listed their home address as 23252 Bridgeport Drive, North Olmsted, Ohio. The I-751 Petition to Remove Conditions of Residence was signed by STEVE AJALTOUNI and EL KHOURY under penalty of perjury and after acknowledging that the marriage was not simply for the purpose of obtaining immigration benefits. EL KHOURY and STEVE AJALTOUNI attached an addendum to the I-751 addressing question number 9 of the form which instructs the beneficiary to list all addresses with dates while living in the United States. On the addendum, EL KHOURY confirmed that she lived at 2880 Wooster Road, Rocky River, Ohio, until January 2007, and then moved to 23252 Bridgeport Drive, North Olmsted, Ohio. EL KHOURY did not list any other addresses on the addendum or the I-751 Petition to Remove Conditions of Residence.

28. On October 9, 2008, GEORGE AJALTOUNI signed his N-400 Application for Naturalization under penalty of perjury. GEORGE AJALTOUNI claimed to be single, never married, and to have no children on the N-400 Application for Naturalization.

29. On October 22, 2008, EL KHOURY's form I-751 Petition to Remove Conditions of Residence was approved by USCIS making her a LPR.

30. On January 8, 2009, EL KHOURY posted on her Facebook page a photo of herself and GEORGE AJALTOUNI sitting next to a typical shopping mall Santa Claus, with S.A.A. sitting on EL KHOURY's lap, and S.C.A. sitting on GEORGE AJALTOUNI's lap. This photo has a decorative holiday background indicating it is 2008. EL KHOURY posted on additional thirteen (13) photos of herself, GEORGE AJALTOUNI, S.A.A., and S.C.A. at the shopping mall. STEVE AJALTOUNI is not observed in any of the photos. On the same date, EL KHOURY posted multiple photos of herself and GEORGE AJALTOUNI together at a New Year's Eve party. GEORGE AJALTOUNI and EL KHOURY have their arms around each other and are embracing in several of the images. STEVE AJALTOUNI was not observed in any of the photos.

31. On January 16, 2009, GEORGE AJALTOUNI appeared in front of USCIS Officer John Vega in Cleveland, Ohio for his N-400 Application for Naturalization interview. GEORGE AJALTOUNI swore under penalty of perjury to Officer Vega that the information on the N-400 Application for Naturalization was true and correct. This included GEORGE AJALTOUNI's confirmation that he was single, never married, and had no children.

32. On February 6, 2009, GEORGE AJALTOUNI became a naturalized United States citizen in the United States District Court, Northern District of Ohio, Cleveland, Ohio (Certificate Number 29679979).

33. On March 5, 2009, GEORGE AJALTOUNI completed a United States passport application. GEORGE AJALTOUNI listed his address as 3391 Bridgeport Drive in North Olmsted, Ohio, on the application. GEORGE AJALTOUNI indicated that he had never been married on the application. The United States passport was issued to GEORGE AJALTOUNI on 3/24/2009.

34. On May 13, 2009, EL KHOURY and STEVE AJALTOUNI completed a United States passport application for minor child S.A.A. (DOB xx/xx/2008). STEVE AJALTOUNI is listed as the father and EL KHOURY is listed as the mother on the application. STEVE AJALTOUNI and EL KHOURY signed the application indicating that they are S.A.A.'s parents. S.A.A.'s permanent address is listed as 23252 Bridgeport Drive, North Olmsted, Ohio on the application. EL KHOURY and STEVE AJALTOUNI provided their Ohio driver's licenses as proof of identity when completing the application. The United States passport for S.A.A. was issued on 5/20/2009.

35. On August 30, 2009, EL KHOURY signed her N-400 Application for Naturalization certifying under penalty of perjury that all information within the application is true and correct. EL KHOURY then submitted the N-400 Application for Naturalization to USCIS for adjudication. EL KHOURY provided the following information on her N-400 Application for Naturalization;

- A. Part 2, Eligibility – I have been a Lawful Permanent Resident of the United States for at least three years, and I have been married to and living with the same U.S. citizen for the last three years, and my spouse has been a citizen for the last three years.
- B. Part 4A, Home Address – 23252 Bridgeport Drive, North Olmsted, Ohio, 44070
- C. Part 6A, Where Have You Lived During the Past Five Years? – 4/4/2006-8/8/2009 (present) 23252 Bridgeport Drive, North Olmsted, Ohio. 9/5/2004-4/4/2006 2880 Wooster Road, Rocky River, Ohio.
- D. Part 8A, Number of Times Married – (1)
- E. Part 8B, Spouse's name and address – STEVE AJALTOUNI, 23252 Bridgeport Drive, North Olmsted, Ohio
- F. Part 8F, Prior Spouse Name – left blank

G. Part 10D, #15, Have You Ever Committed a Crime or Offense for Which You Were Not Arrested? – No

H. Part 10D, #22d, Have You Ever Been Married to More Than One Person at the Same

I. Time? – No

J. Part 10D, #23, Have You Ever Given False or Misleading Information to any US Government Official While Applying for any Immigration Benefit or to Prevent Deportation, Exclusion, or Removal? – No

K. Part 10D, #24, Have You Ever Lied to any U.S. Government Official to Gain Entry or Admission Into the United States - No

36. On October 13, 2009, EL KHOURY filed an Application for Child Benefits (JFS 01138) with the Ohio Department of Jobs and Family Services. EL KHOURY listed her home address as 3391 Bridgeport Drive in North Olmsted, Ohio, on the application. EL KHOURY indicated that STEVE AJLTOUNI is an absent parent who does not provide child support.

37. On November 12, 2009, GEORGE AJALTOUNI submitted a letter to the Healthcare Resources Child Unit, Ohio Department of Jobs and Family Services, indicating that EL KHOURY and her two children live with him at 3391 Bridgeport Drive in North Olmsted, Ohio. GEORGE AJALTOUNI identified EL KHOURY as his sister-in-law, and stated that he supports her and her children as much as possible.

38. On December 10, 2009, EL KHOURY appeared in front of USCIS Officer Jacqueline Guevara in Cleveland, Ohio for her N-400 Application for Naturalization interview. EL KHOURY swore under penalty of perjury to Officer Guevara that the information on the N-400 Application for Naturalization is true and correct, including;

- A. Part 2, Eligibility – I have been a Lawful Permanent Resident of the United States for at least three years, and I have been married to and living with the same U.S. citizen for the last three years, and my spouse has been a citizen for the last three years.
- B. Part 4A, Home Address – 23252 Bridgeport Drive, North Olmsted, Ohio, 44070
- C. Part 6A, Where Have You Lived During the Past Five Years? – 4/4/2006-8/8/2009 (present) 23252 Bridgeport Drive, North Olmsted, Ohio. 9/5/2004-4/4/2006 2880 Wooster Road, Rocky River, Ohio.
- D. Part 8A, Number of Times Married – (1)
- E. Part 8B, Spouse's name and address – STEVE AJALTOUNI, 23252 Bridgeport Drive, North Olmsted, Ohio.
- F. Part 8F, Prior Spouse Name – left blank
- G. Part 10D, #15, Have You Ever Committed a Crime or Offense for Which You Were Not Arrested? – No
- H. Part 10D, #22d, Have You Ever Been Married to More Than One Person at the Same Time? – No
- I. Time? – No
- J. Part 10D, #23, Have You Ever Given False or Misleading Information to any US Government Official While Applying for any Immigration Benefit or to Prevent Deportation, Exclusion, or Removal? – No
- K. Part 10D, #24, Have You Ever Lied to any U.S. Government Official to Gain Entry or Admission Into the United States - No

39. On January 15, 2010, EL KHOURY became a naturalized United States citizen in the United States District Court, Northern District of Ohio, Cleveland, Ohio (Certificate Number 29671545).

40. On March 11, 2010, EL KHOURY completed a United States passport application. EL KHOURY listed her address as 3391 Bridgeport Drive in North Olmsted, Ohio. GEORGE AJALTOUNI is listed on the application as EL KHOURY's emergency contact and STEVE AJALTOUNI is listed as her husband. The United States passport was issued to EL KHOURY on 3/23/2010.

41. On July 2, 2010, EL KHOURY and STEVE AJALTOUNI divorced in Cleveland, Ohio. Cuyahoga County Clerk of Court records list the divorce as "dissolution – no children."

42. On March 16, 2011, STEVE AJLTOUNI and EL KHOURY completed a United States passport application for minor child S.C.A. STEVE AJALTOUNI is listed as the father and EL KHOURY is listed as the mother on the application. STEVE AJALTOUNI and EL KHOURY signed the application indicating that they are S.C.A.'s parents. S.C.A.'s permanent address is listed as 3391 Bridgeport Drive, North Olmsted, Ohio on the application. EL KHOURY and STEVE AJALTOUNI provided their Ohio driver's licenses as proof of identity when completing the application. GEORGE AJALTOUNI is listed as the emergency contact on the application. GEORGE AJALTOUNI is listed as S.C.A.'s uncle on the application. The United States passport for S.C.A. was issued on 4/8/2011.

43. On March 4, 2014, EL KHOURY completed a United States passport application for minor child S.A.A. There is no father listed on the passport application. The emergency contact on the passport application is listed as GEORGE AJALTOUNI. The United States passport for S.A.A. was issued on 3/21/2014.

44. On September 16, 2014, EL KHOURY was interviewed by Cleveland FBI Special Agent John Breen and Cleveland FBI Task Force Officer John Hicks. EL KHOURY confirmed that she married STEVE AJALTOUNI in 2004 and divorced him in approximately 2007. EL KHOURY stated that in 2007 she moved in with GEORGE AJALTOUNI and continued to live with him to the date of interview. EL KHOURY claimed that neither STEVE AJALTOUNI nor GEORGE AJALTOUNI are the father of her (2) children. EL KHOURY further stated that the children believe GEORGE AJALTOUNI is their father. EL KHOURY admitted to being in a relationship with GEORGE AJALTOUNI since 2007. EL KHOURY confirmed that GEORGE AJALTOUNI owned a Georgio's Pizza on Dennison Avenue in Cleveland, Ohio.

45. On July 24, 2015, Cleveland FBI Special Agent John Breen and Cleveland FBI Task Force Officer Doug Prenger interviewed EL KHOURY. EL KHOURY claimed that she was moving to Lebanon with her children in August 2015. EL KHOURY stated that she and her children would be living with her family in Lebanon, and not with GEORGE AJALTOUNI. EL KHOURY confirmed that STEVE AJALTOUNI was the only person she ever married. EL KHOURY admitted that GEORGE AJALTOUNI was the father of her 3 children.

46. On November 18, 2015, Cleveland FBI Special Agent John Breen and Cleveland FBI Task Force Officer Doug Prenger interviewed STEVE AJALTOUNI. STEVE AJALTOUNI confirmed that he married EL KHOURY in 2003/2004 and that they were married for 4/5 years. STEVE AJALTOUNI suspected that GEORGE AJALTOUNI's and EL KHOURY's relationship began while they were still married. STEVE AJALTOUNI denied that EL KHOURY and GEORGE AJALTOUNI had been married.

47. On January 10, 2018, Cleveland FBI Special Agent John Breen and Cleveland FBI Task Force Officer Doug Prenger interviewed Claude Alfahel. During a prior interview, Claude

Alfahel stated that he worked at Georgio's Pizza with GEORGE AJALTOUNI and EL KHOURY from 2006 through 2011. Claude Alfahel stated that he always knew EL KHOURY as GEORGE AJALTOUNI's wife. Claude Alfahel claimed that he heard rumors that EL KHOURY married STEVE AJALTOUNI to get "papers." Claude Alfahel recalled that in the 2008-2010 timeframe, the AJALTOUNI family feuded with an unidentified Lebanese family. Claude Alfahel overheard GEORGE AJALTOUNI telling an unknown person during a phone call that he was worried that this family would tell authorities that STEVE AJALTOUNI married EL KHOURY.

48. On January 17, 2018, Cleveland FBI Special Agent John Breen and Cleveland FBI Task Force Officer Doug Prenger interviewed John Tokarczyk. John Tokarczyk confirmed that he worked at Georgio's Pizza, 7146 Denison Avenue, Cleveland, Ohio, with GEORGE AJALTOUNI and EL KHOURY from 2008 to approximately February 2015. John Tokarczyk stated that he knew EL KHOURY as GEORGE AJALTOUNI's spouse. John Tokarczyk recalled that EL KHOURY and GEORGE AJALTOUNI had a young daughter and son. John Tokarczyk stated that the son was named Steve and had problems with his eyes. John Tokarczyk positively identified photos of EL KHOURY, GEORGE AJALTOUNI, and STEVE AJALTOUNI.

49. On January 23, 2018, Cleveland FBI Task Force Officer Doug Prenger and I interviewed Hanna Alfahel at his Cleveland, Ohio residence. Also present during the interview were Goldie Rivera and John Tokarczyk. Hanna Alfahel worked at Georgio's Pizza, 7146 Denison Avenue, Cleveland, Ohio from 2007 to 2014. Hanna Alfahel positively identified photos of EL KHOURY, GEORGE AJALTOUNI, and STEVE AJALTOUNI. Even before Hanna Alfahel started working at Georgio's he knew that EL KHOURY and GEORGE AJALTOUNI were married. Hanna Alfahel explained that in 2006, his brother Claude Alfahel, who was working at Georgio's at the time, told Hanna Alfahel that EL KHOURY was worried about GEORGE

AJALTOUNI. GEORGE AJALTOUNI was in Lebanon during the civil war and could not travel back to the United States. According to Hanna Alfahel, EL KHOURY indicated that GEORGE AJALTOUNI was her husband. After Hanna Alfahel was hired at Georgio's, GEORGE AJALTOUNI introduced EL KHOURY as his wife. During this time period, EL KHOURY often worked at the Georgio's. When GEORGE AJALTOUNI and EL KHOURY had their son in 2008, EL KHOURY began to work at the Georgio's less often because the child had cancer. Hanna Alfahel stated that it was common knowledge that GEORGE AJALTOUNI and EL KHOURY were married, and that Hanna Alfahel attended Christmas parties at their home in 2007 and 2008. According to Hanna Alfahel, Goldie Rivera and John Tokarczyk, there were rumors that STEVE AJALTOUNI married EL KHOURY to get her "papers," and that the children were not registered to AJALTOUNI. However, AJALTOUNI's and EL KHOURY's children referred to GEORGE AJALTOUNI as their father.

50. On February 8, 2018, Cleveland FBI Task Force Officer Doug Prenger and I interviewed Commander David Wright, Cleveland Clinic Police Department, 9500 Euclid Avenue, Cleveland, Ohio. David Wright positively identified photos of STEVE AJALTOUNI and GEORGE AJALTOUNI. David Wright did not recognize the photo of EL KHOURY. David Wright confirmed that he knew STEVE AJALTOUNI well as they had been next-door neighbors when he lived on Bridgeport Drive in North Olmsted, Ohio. David Wright stated that he lived on Bridgeport Drive from 1998 - 2013, and that STEVE AJALTOUNI moved next door to him approximately (6) months after the prior owners moved out.¹ David Wright claimed that STEVE AJALTOUNI was not married when he first moved into 23252 Bridgeport Drive, North Olmsted,

¹ It is estimated that STEVE AJALTOUNI moved into 23252 Bridgeport Drive, North Olmsted, Ohio, in November 2006, as this is when STEVE AJALTOUNI purchased the residence.

Ohio. David Wright claimed that STEVE AJALTOUNI got married in approximately 2012. David Wright described STEVE AJALTOUNI's wife as having blond hair and of unknown descent. David Wright never spoke with STEVE AJALTOUNI's wife and did not know her name. David Wright stated that he did not know GEORGE AJALTOUNI too well, but recalled that he moved into the neighborhood shortly after STEVE AJALTOUNI. David Wright stated that GEORGE AJALTOUNI was married and had (2) children. David Wright did not know GEORGE AJALTOUNI's wife's name. David Wright recalled that GEORGE AJALTOUNI's son lost an eye to cancer. David Wright stated that GEORGE AJALTOUNI's daughter was approximately (7) years old and his son approximately (5) years old.

51. On February 15, 2018, Cleveland FBI Task Force Officer Doug Prenger and I interviewed John and Joanne Simantiris at their residence located at 3401 Bridgeport Drive, North Olmsted, Ohio. John and Joanne Simantiris recognized the photos of EL KHOURY, GEORGE AJALTOUNI, and STEVE AJALTOUNI. John and Joanne Simantiris have lived at their residence for nineteen years and confirmed that EL KHOURY and GEORGE AJALTOUNI lived at 3391 Bridgeport Drive. John and Joanne Simantiris did not know GEORGE AJALTOUNI and EL KHOURY very well, but described them as cordial neighbors. John and Joanne Simantiris believed that EL KHOURY was GEORGE AJALTOUNI's wife based upon observations during the time they were neighbors. John and Joanne Simantiris confirmed that EL KHOURY and GEORGE AJALTOUNI had two (2) children, the oldest was a daughter and the youngest was a son named Steve. The son had a medical problem with his eye and had visited the Cleveland Clinic for treatment. John and Joanne Simantiris estimated the daughter's age as (6) or (7) and the son's age as (4) or (5) at the time EL KHOURY moved out of the residence. John and Joanne Simantiris stated EL KHOURY was pregnant at the time she and GEORGE AJALTOUNI sold the

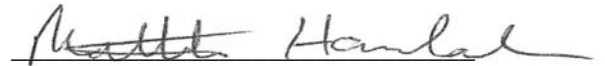
house at 3391 Bridgeport Drive and moved. John and Joanne Simantiris both recognized STEVE AJALTOUNI as GEORGE AJALTOUNI's brother and pointed out that he lived on the same street on the cul-de-sac. A day or two prior to GEORGE AJALTOUNI and EL KHOURY moving into 3391 Bridgeport Drive, John and Joanne Simantiris noticed EL KHOURY inspecting the home at 3391 Bridgeport Drive.

52. On February 15, 2018, Cleveland FBI Task Force Officer and I interviewed Albert Vasek at his residence located at 3411 Bridgeport Drive, North Olmsted, Ohio. Albert Vasek recognized photos of GEORGE AJALTOUNI, EL KHOURY, and STEVE AJALTOUNI. Albert Vasek has lived with his wife and children at their Bridgeport Drive residence since 2002. Albert Vasek confirmed that GEORGE AJALTOUNI and EL KHOURY lived at 3391 Bridgeport Drive with their (2) children since approximately 2007/2008. Albert Vasek recognized EL KHOURY as GEORGE AJALTOUNI's wife, but could not recall her name. Albert Vasek stated that EL KHOURY's and GEORGE AJALTOUNI's daughter was named S., and their son was named S. S.A. (daughter) used to play with one of Albert Vasek's daughters. Albert Vasek believed S.A. (daughter) to be (13) years old and S.A. (son) to be around (8) or (9) years old. Albert Vasek recalled that EL KHOURY's and GEORGE AJALTOUNI's son has a medical issue with his eye. EL KHOURY was pregnant with S.A. (son) when they moved into 3391 Bridgeport Drive. According to Albert Vasek, GEORGE AJALTOUNI and EL KHOURY introduced themselves as husband and wife when they moved into the neighborhood. Albert Vasek also believed that they were the parents of S.A. (daughter) and S.A. (son).

53. Based upon the foregoing information, your Affiant respectfully submits that there is probable cause to believe that EL KHOURY committed Naturalization Fraud in violation of Title 18 U.S.C. 1425(a) by securing status for herself as a naturalized United States citizen; that STEVE

AJALTOUNI aided and abetted EL KHOURY in committing Naturalization Fraud in violation of Title 18 U.S.C 1425(a) and 2; and that GEORGE AJALTOUNI engaged in Naturalization Fraud in violation of Title 18 U.S.C. 1425(b), by securing status for himself as a naturalized United States citizen.

54. Affiant requests the sealing of this Affidavit, Application, Warrant and all associated papers. This investigation is ongoing and notice of an arrest warrant may lead to the flight of STEVE AJALTOUNI from the United States, and/or the avoidance of travelling into the United States by EL KHOURY.



Matthew Hamulak
Special Agent
Homeland Security Investigations

SWORN TO AND SUBSCRIBED before me this 7th day of June 2018.



WILLIAM H. BAUGHMAN, JR.
U. S. MAGISTRATE JUDGE